UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

Criminal Case No.: 12 Cr. 973 (PGG)

MATHEW MARTOMA,

Defendant.

ORAL ARGUMENT REQUESTED

DEFENDANT MATHEW MARTOMA'S NOTICE OF MOTION TO COMPEL THE PRODUCTION OF CERTAIN DOCUMENTS WITHHELD BY THE GOVERNMENT OR THE UNIVERSITY OF MICHIGAN

PLEASE TAKE NOTICE that, upon the annexed Declaration of Richard M. Strassberg, Esq., the exhibits thereto, and the accompanying memorandum of law, the defendant Mathew Martoma will move this Court before the Honorable Paul G. Gardephe at the United States District Courthouse, 40 Foley Square, New York, New York 10007, at such a date and time as the Court may direct, for an Order directing the United States of America to produce certain documents withheld by the Government or the University of Michigan and granting such other and further relief to which the Court deems the defendant entitled.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Mr. Martoma will rely upon the accompanying memorandum of law and appendix of exhibits, all of which are submitted contemporaneously herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: June 21, 2013

New York, NY

Respectfully submitted,

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Attorneys for Defendant Mathew Martoma

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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2013, I caused a true and correct copy of the foregoing to

be served by electronic means, via the Court's CM/ECF system, on all counsel registered to

receive electronic notices. I also certify that I have caused copies of the aforementioned

document to be served via first class mail, postage prepaid upon all non-CM/ECF participants.

/s/ Richard M. Strassberg

Richard M. Strassberg (RS5141)

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